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Attorney for Defendant
DARRYL LYNN KAUFFMAN

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 2:22-cr-0225 DC
)	
Plaintiff,)	STIPULATION REGARDING
)	CONTINUANCE OF SENTENCING AND
v.)	NEW DISCLOSURE DATES; PROPOSED
)	FINDINGS AND ORDER
DARRYL LYNN KAUFFMAN,)	
)	
Defendant.)	
)	
)	
)	
)	
)	

STIPULATION

Plaintiff United States of America, by and through its counsel of record Assistant United States Attorney HEIKO COPPOLA, and the Defendant, DARRYL LYNN KAUFFMAN, by and through his counsel of record TASHA PARIS CHALFANT, hereby stipulate and request that the Court make the following findings and Order as follows:

1. By previous order, this matter was set for sentencing before Judge Dena M. Coggins on June 6, 2025. (Docket 42.)
2. This sentencing was set a week earlier than the usual 90 days from change of plea in order to accommodate the government's military duty and schedules of both counsel. By this stipulation, the defendant now moves to reset the sentencing from June 6, 2025 to July 16, 2025.

STIPULATION AND ORDER FOR CONTINUANCE OF SENTENCING

1 3. The parties agree and stipulate, and request that the Court find the following:

2 a. According to the PSR disclosure dates, the draft PSR was due on April 25, 2025.
3 (Docket 43.) On that same date, Probation Officer Julie Besabe notified counsel the report was
4 with her supervisor for review and would be filed within just a few days. She acknowledged the
5 slightly late filing may allow counsel a bit of flexibility for filing our respective informal
6 objections. We were all hoping to maintain the sentencing date of June 6, 2025.
7

8 b. On April 28, 2025 the draft PSR was filed. (Docket 45.) Counsel promptly arranged
9 for the draft PSR to be mailed to Mr. Kauffman who was moved to Taft the week of his change of
10 plea. From the date of his arraignment until his change of plea, Mr. Kauffman had been housed at
11 the Sacramento County Jail. Within 7 days of the PSR being filed, Mr. Kauffman received the
12 draft PSR in his legal mail at Taft.
13

14 c. The draft PSR contained significant adjustments/additional specific offense
15 characteristics above the estimated guidelines counsel contemplated in the plea agreement. A
16 significant amount of effort is being expended in order to prepare the informal objections with Mr.
17 Kauffman in light of his location at Taft, the voluminous records and the significant increase to
18 his estimated advisory guidelines. Counsel has been having regular GoTo meetings with Mr.
19 Kauffman at Taft, however, the informal objections were not completed in compliance with the
20 disclosure date of May 9, 2025.
21

22 d. Counsel for the defendant requires additional time to thoroughly review the draft
23 PSR with Mr. Kauffman, research and prepare informal objections which requires further review
24 of the voluminous discovery, consult with her client and relevant experts, and to discuss the
25 consequences and the estimated advisory guidelines.
26

27 e. Counsel for the defendant believes that failure to grant the above-requested
28

1 continuance would deny her the reasonable time necessary for effective preparation, taking into
2 account the exercise of due diligence.

3 f. The government and probation do not object to the continuance.

4 g. Based on the above, the defense requests the following new sentencing date along
5 with new disclosure dates:

6 Informal Objections due: June 18, 2025

7 Report due: June 25, 2025

8 Correction date: July 2, 2025

9 Reply/Formal Objections: July 9, 2025

10 Sentencing: July 16, 2025

11
12 All counsel have reviewed this proposed order and authorized Tasha Chalfant to sign it on
13 their behalf.

14 IT IS SO STIPULATED.

15 Dated: May 14, 2025

16 by: /s/Tasha Chalfant for
17 HEIKO COPPOLA
18 Assistant U.S. Attorney
19 Attorney for Plaintiff

20 Dated: May 14, 2025

21 by: /s/Tasha Chalfant
22 TASHA CHALFANT
23 Attorney for Defendant
24 DARRYL LYNN KAUFFMAN

ORDER

The court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, ADOPTS the stipulation of the parties in its entirety as its order.

Based on the stipulation of the parties and facts contained therein, the court finds that the failure to grant a continuance in this case would deny defense counsel the time necessary to prepare for the hearing.

The court orders that the sentencing currently scheduled for June 6, 2025 be continued and specially set for July 16, 2025, at 9:30 a.m. in Courtroom 8 before the Honorable Dena M. Coggins, along with the following new disclosure dates:

Informal Objections due: June 18, 2025

Report due: June 25, 2025

Correction date: July 2, 2025

Reply/Formal Objections: July 9, 2025

Sentencing: July 16, 2025

IT IS SO ORDERED.

Dated: May 16, 2025


Dena Coggins
United States District Judge